

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SECURITIES AND EXCHANGE)	
COMMISSION,)	
)	
)	
v.)	Case No. 14-cv-11858-NMG
)	
TELEXFREE, INC., ET AL.)	
Defendants)	

**ASSENTED-TO MOTION FOR LIMITED RELIEF FROM “CONSENT ORDER
AS TO DEFENDANT CARLOS WANZELER”**

The Defendant, Carlos Wanzeler, through undersigned counsel, moves this Court for limited relief from the Consent Order as to Defendant Carlos Wanzeler (Dkt. No. 101) entered on May 9, 2014, such that the following bank account will not be subject to the Court’s Order: St. Mary’s Credit Union, Account Number ***9009, held in the name of Brazilian Help, Inc. As grounds and reasons therefore, the identified business account of Brazilian Help, Inc. is not related to the conduct of TelexFree, Inc. as alleged in the SEC action. The SEC assents to this motion and agrees that the identified account should not be the subject of the Court’s Order and that the order freezing the bank account can be lifted, given that the account is unrelated to any TelexFree, Inc. conduct.

Wherefore, Mr. Wanzeler respectfully requests that the Court grant this motion.

Respectfully submitted,
Counsel for Carlos Wanzeler,

/s/ Paul V. Kelly
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Dated: March 24, 2015

Certificate of Service

I, Paul Kelly, certify that on this date a copy of the foregoing document has been served via the Electronic Court Filing system on all registered participants.

/s/ Paul Kelly
Paul Kelly